

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jason William Myers

Case No. 1:22-mj-30509

Judge: Morris, Patricia T.

Filed: 11-28-2022 At 04:21 PM

SEALED MATTER (krc)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 4, 2022 in the county of Ogemaw in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(a)(1)(A)

Dealing Firearms without a License.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 28, 2022

City and state: Bay City, Michigan

*Complainant's signature*Christopher Zylik, Special Agent- ATF*Printed name and title**Judge's signature*Patricia T. Morris, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

United States v. Jason William Myers

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since January of 2022. I am currently assigned to the Detroit Field Division, Flint Field Office. Before working for the ATF, I was employed by the Michigan Department of State Police (MSP) for approximately eight years. During my employment with ATF and MSP, I have conducted or participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal street gangs, and other violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I have received information from a credible and reliable confidential informant, identified hereinafter as ATF1, regarding a subject identified as Jason William Myers (w/m 05/06/1969). ATF1 provided information that Myers

manufactures and sells machineguns and silencers. Additionally, Myers sells and uses methamphetamine at his residence located at 2270 Townline Road Rose City, Michigan.

4. On September 16, 2022, ATF Special Agent (SA) Hurt and Genesee County Sheriff's Office (GCSO) Sergeant (Sgt) Dobbs met with ATF1 reference the manufacture and sale of National Firearms Act (NFA) items to include machineguns and silencers by Myers. ATF1 advised that Myers was in his late 40's and early 50's. Myers has bragged about supplying the Outlaws, Outlaw Motorcycle Gang (OMG) and the Avengers OMG (Flint, MI) with firearms, including machine guns and silencers. ATF1 has purchased firearms from Myers in the past including a .22 caliber firearm, a 12 Gauge shotgun, and a 9mm pistol even though Myers is aware ATF1 is a convicted felon. ATF1 advised he has sold "Ice" (known street slang for crystal methamphetamine) to Myers in the past. Myers is believed to both use and sell crystal methamphetamine according to ATF1. Myers advised ATF1 that he makes fully automatic machine guns out of AR rifle builds and full-auto pistol builds. Myers advised he makes silencers as well. Myers spoke about dealing firearms to "Frankenstein" of the Avengers OMG in the past. "Frankenstein" is known to law enforcement to be Frank Joseph Bartels (w/m 10/1/1965) who was known to be the leader of the Avengers OMG.

5. SA Hurt was able to identify Myers, through SOS photographs, which was verified by ATF1. Myers address was found to be 2270 Townline Road, Rose City, MI 48654.

6. SA Hurt contacted Industry Operations Investigator (IOI) Murphy and requested the FFL status of Myers. IOI Murphy advised that Myers did not possess an FFL. SA Hurt conducted a LEIN/NCIC query of Myers for his criminal history. Myers has been convicted of misdemeanors in the past but no felony convictions.

7. On September 23, 2022, ATF SA Hurt received cell phone videos and screenshots from ATF1. The date stamp on the videos shows 09/21/2022. On the videos, Myers can be heard stating the following: In one video: Myers states that he uses titanium tubes with nine (9) cups for “individual chamber drilled just for bullet size.” Myers states that the silencer is good for 2000 to 2500 rounds before it “wears out.” In my training and experience Myers is discussing the exterior tube and internal parts and assembly of a silencer. In another video ATF1 asks “what makes it fully?” (in my training and experience, “fully” is referring to a fully automatic firearm and Myers discusses what he does to the firearm to make it fully automatic). Myers states that he “drills from the inside”... “take this notch out”... “take that sear, drop it right on top and it’ll be fully automatic.” In my training and experience Myers is describing the internal mechanism (drop-in sear) and how it is installed in order to

make a firearm fully automatic. In another video: ATF 1 asks “how long does it take you to build one of them silencers?” Myers responds, “about two days because it’s pretty fucking precise”. Myers further states that there is drilling, machining and internal boring that he does to the silencers. Myers discusses the gas ports and how the gas is released in each chamber, so the pressure doesn’t go outward and that’s what makes it quiet. In another video: ATF1 and Myers discuss payment for firearms.

8. SA Zylik observed Myers holding a lower receiver (firearm) in a video and was able to identify the lower receiver as an Anderson Manufacturing, AM-15, bearing serial #20025372. S/A Hurt conducted an eTrace query of the above listed firearm (T20220473787). The purchase date is 06/27/2020 by Jason William Myers, 2270 Townline, Rose City, MI 48654. The dealer is Ultimate Archery & Outdoors (FFL 43811054) 2275 S M-33 West Branch, MI 48661.

9. On September 30, 2022, ATF SA Hurt received a screenshot from ATF 1 of text messages between ATF1 and Myers. Myers text “The other is done, except for the drop in and quiet time, I finished it the day you left. I can get that to you late tonight or tomorrow AM... before 6, if you have the cash.” Based on my training and experience, the “drop in” is referring to the sear which converts the weapon to a fully automatic. The “quiet time” is referring to the silencer.

10. On October 3, 2022, ATF1 contacted ATF SAs Hurt and Zylik reference Myers. ATF1 advised that Myers stated he had three full-auto machine guns completed and ready for sale at his home, located at 2270 Townline Rd. Rose City, MI. ATF1 added that Myers asked about getting a half pound of crystal methamphetamine from ATF1. ATF1 advised that Myers is both a user of crystal methamphetamine and sells it as well. ATF1 also advised that Myers sells cocaine as well.

11. On October 4, 2022, a controlled purchase of a firearm was conducted by ATF1 in the presence of an ATF undercover agent (UCA) at 2270 Townline Rd, Rose City, MI 58654. Upon arrival, Myers was assembling the AM-15 rifle, Myers explained that he was in the military for 26 years and while he was in the Marine Corps, he did this (suggesting building and/or working on firearms), so that's why he does it out here. UCA observed multiple rifles leaning up against Myers' workshop, UCA asked about one AR-15 style rifle. Myers explained it was loaded, and that it was a full-automatic rifle. The full-automatic rifle was also equipped with a night scope. UCA asked what the cost was for the full-automatic rifle. Myers advised the price with the night scope was \$1,100.00. Myers explained the full-automatic rifle that UCA was looking at belonged to "a customer" named "Chip." Myers referenced a rifle barrel that was in the workshop. UCA asked about the

barrel if he (UCA) could buy a rifle today. Myers advised that was the barrel he would put on it because it was a match grade barrel. But Myers also advised, "I can do anything you want." Myers added that he makes very specific barrels for very specific guns. Myers explained he had a mill room next to the workshop and then showed UCA the milling tools. Myers had a couple vertical mills and a horizontal mill. UCA held the rifle sold to the CI and commented on how light the rifle was. MYERS advised it was aircraft aluminum that he uses. Myers advised aircraft aluminum couldn't be tracked. UCA asked if Myers had any silencers. Myers advised he can make them. UCA asked about pricing and Myers advised he usually charges between \$400-\$500 depending on the length. In Myers' workshop he showed UCA the piece of aluminum he (Myers) makes the drop in sears out of. Myers advised he had a piece of aluminum that was going to use for "one of the Jokers," meaning a member of the Jokers motorcycle club. Myers stated there is about to be a war, referencing violence between the Hells Angels motorcycle club and Outlaw motorcycle club. Myers handed UCA a piece of aluminum that was UCA's aluminum Myers would make an auto sear out of. Myers stated, "all you're going to do is drop this in right below your trigger and it's going to make it fully-automatic. This is a sear." Myers then showed a piece of paper to UCA with a drawing of a fully-automatic sear. He described the drawing as "full dimensions of

the sear.” UCA then gave the piece of aluminum back to Myers. Myers advised he would make an auto sear out of it. Myers stated that he can’t sell the rifle and the aluminum (referencing the auto drop-in sear) to the UCA at the same time. Myers separates the sale between the two items. Myers states that he could meet the UCA in the Flint area to deliver an auto-sear to the UCA. Myers advised he owns a house in Clio, MI

12. UCA observed multiple maglite flashlights on Myers’ workbench. Through training and experience, UCA knew some people make silencers out of large Maglite flashlights. UCA then asked Myers if those were silencers. Myers explained no, but they will look like a flashlight end without the flashlight. It would be 9.5 inches and made with two titanium caps with aluminum cones inside. After 1,500 to 2,000 shots, you can open one cap, dump the cones out, and put in another set of cones. Myers would provide 2 or 3 set of cones. He described the sound of shot similar to a “BB gun going off.”

13. Myers picked up a block of a black hard material and he excitedly stated he had recently made a belt buckle gun out of carbon fiber for someone. Myers added that you can run it through an x-ray detector, and it wouldn’t get detected. The left-over carbon fiber was enough to make a single shot firearm. Only thing that would get detected would be the round (meaning ammunition).

14. On October 4, 2022, Myers was paid \$1,100, by ATF1, for an Anderson Manufacturing, AM-15, bearing serial #20025372. The firearm purchased is the same lower receiver as observed in the videos ATF1 took previously and queried in e-Trace.

15. Myers began to ask UCA how he (UCA) wanted him (Myers) to build a rifle. Myers advised, “so you want go with a 16” barrel.” Then asked if UCA wanted a storm trooper. Myers advised he was going to set it up for fully-automatic, so he would put a flash hider on it. Myers’ stated he would sell metal clips for \$15 apiece. UCA he would like flip-up sights on the rifle. UCA asked how much the rifle would be with a silencer and a full sear. Myers advised the price would be \$750.00 for the gun and then \$500 for the other two pieces. Myers advised it would be \$1,200. Myers then began to look through his workshop for his auto sear. Once he found it, he advised we could go play with a couple hundred rounds. After looking for a while and calling his brother “Chip,” it was determined his brother took it and was going to bring it back that evening. ATF1 observed a crossbow on the wall of Myers’ workshop. ATF1 asked if he could hunt with it because he (ATF1) was a felon. Myers advised he could hunt because it was a bow. It was perfectly legal for the ATF1 to own one. Myers advised he had three ahead of UCA and that UCA’s rifle would be number four in line. Myers’ told UCA to get his (Myers’) phone

number from the CI. Myers put the firearm he sold to the CI in a rifle bag and also put a 100-round magazine in a separate bag. This 100-round drum style magazine was observed earlier during the undercover purchase.

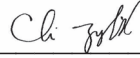
16. On 10/05/2022, ATF1 spoke with Myers who advised that he was making a drop-in sear and silencer for the firearm the ATF UCA purchased.

17. On 10/13/2022, ATF UCA called Myers and asked if his firearm was ready. Myers advised that he just completed three firearms today. Myers stated the aluminum for UCA's firearm and another person's was not in yet. Myers gets the aluminum from Boeing or Honeywell. Specifically, to the UCA's firearm, Myers still needed to press the barrel in the next two days. Myers has four barrels to do. Myers then polishes the barrels and then makes sure the clearances are where he wants them to be. Myers then stated the "stick" is \$800.00, common term used for a rifle. Myers offered to bring the firearm to the UCA in Clio or Flint the following week if it's done. Myers built a firearm for a guy that works for Conley's. When UCA brought up on the silencer and auto-sear, Myers advised once the aluminum is in, Myers would bring them to the UCA the next day. Myers then confirmed the price would be \$800.00 for the rifle and \$400 for the silencer and auto-sear and the total price is \$1,200.00.

18. On 11/09/2022, Sergeant Dobbs, Genesee County Sheriff's Office

(GCSO), was contacted by a confidential informant reference a firearm. This confidential informant will be referenced to as CI. The CI advised that on 11/09/2022 two known drug dealers, identified as Jason Callahan and Ryan Burton AKA “Bigs” came to CI’s residence. Jason Callahan is a known convicted felon. CI witnessed Callahan sell Burton a Mossberg 500 pump action shotgun for \$300. CI advised that the shotgun had been altered by a known illegal gun dealer identified as Myers. CI advised that Callahan told him he purchased the shotgun with several other guns directly from Myers. CI advised that shortly after selling the shotgun to Burton, Callahan left CI’s residence. Burton stayed for several hours and got high on methamphetamines. Burton left the residence and left the shotgun in CI’s garage. CI immediately contacted GCSO Detective Task Force Officer (D/TFO assigned to the DEA) Duhart and advised him of the situation as soon as Burton left his residence. The shotgun was then turned over to SA Hurt (ATF Flint). CI advised that Callahan told him that he could obtain fully automatic machine guns from Myers.

19. Based upon all of the information contained herein, I have probable cause to believe that Myers is dealing firearms without a license in violation of 18 U.S.C. § 922(a)(1)(A).



CHRISTOPHER ZYLIK, Affiant

Special Agent

Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means

on November 28, 2022.



HON. PATRICIA MORRIS

United States Magistrate Judge